

**Federal Defenders  
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October 23, 2023

The Hon. Philip M. Halpern  
United States District Judge  
United States Courthouse  
300 Quarropas St.  
White Plains, NY 10601

Re: *United States v. Jamees Cooke*, Case No. 23-cr-08 (PMH)

Dear Judge Halpern,

I am requesting a month-long adjournment of the pretrial briefing schedule in the above-captioned case to give the parties additional time to negotiate a pretrial resolution.

On April 25, 2023, I filed a mitigation submission with the United States Attorney's Office. In August, the USAO advised that they were not persuaded by my mitigation submission and provided a *Pimentel* letter. The parties appeared in Court on August 23, 2023. There, the Court set the following schedule:

Defense motions:	10/27/2023
Government Response:	11/27/2023
Defense Reply:	12/11/2023
Status Conference:	12/20/2023
Final Pretrial Conf.:	2/7/24
Trial:	2/21/24

Since our last appearance on August 23, 2023, I have received hundreds of pages of records relevant to a potential pretrial resolution in this case. I incorporated these voluminous records into a supplemental mitigation submission for the government's consideration. I intend to submit this supplemental mitigation submission by today or tomorrow. As such, I propose the following revised schedule, which will give the parties additional time to find a pretrial resolution.

Defense motions:	11/29/2023
Government Response:	12/29/2023
Defense Reply:	1/11/2024
Status Conference:	A date convenient to the Court in January 2024
Final Pretrial Conf.:	2/7/24
Trial:	2/21/24

I have discussed my request for an adjourned motions schedule with government counsel, AUSA Timothy Ly. He does not object.

Sincerely,



Rachel Martin

cc: AUSA Timothy Ly